

April 17, 2000

Dr Jane Henney, Commissioner
Food and Drug Administration
5600 Fishers Lane
Rockville, MD 20857

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Dear Dr Henney:

I'm writing to urge the FDA to allow manufacturers of non-dairy beverages to continue to use the word "milk" on their labels. Since many more animals than cows produce milk and many beverages satisfy the definition of "milk", the dairy industry should not have proprietary use of the word "milk".

According to the *Associated Press*, the National Milk Producers Federation recently filed a complaint with the FDA to stop makers of non-dairy beverages--especially those that produce soy milk--from using the word "milk" on their packages. But the suggestion that only dairy producers should be able to use the term "milk" is ludicrous. *Webster's Collegiate Dictionary*, Tenth Edition, defines milk as "a fluid secreted by the mammary glands of females for the nourishment of their young" and "a liquid resembling milk in appearance: as...the juice of a coconut." Note the dictionary doesn't state the cow is the only mammal to produce milk--in fact there's goat's milk in addition to human milk. Also, since soy milk, coconut milk, rice milk, and nut milk all look like milk, these liquids satisfy *Webster's* definition of "milk". Producers of non-dairy beverages all stipulate on their packages the "kind" of milk contained within. To avoid ambiguity, I think the FDA should insist dairy producers label their beverage as "Cow's Milk".

Since non-dairy beverages meet *Webster's* definition of "milk" and many female mammals other than cows--including humans--secrete milk, any attempt by the dairy industry to monopolize the word "milk" should be construed as petty harassment of legitimate businesses. I urge the FDA to reject the dairy industry's ludicrous complaint that they alone should be able to call their products as "milk". Instead insist that the dairy industry label their beverage "Cow's Milk". Thank you.

Sincerely yours,



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